

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	: 3:18-CR-097
	:
v.	: (Judge Mariani)
	:
ROSS ROGGIO	: (Electronically Filed)

MOTION FOR ENLARGEMENT OF TIME
TO FILE PRETRIAL MOTIONS

AND NOW comes the Defendant, Ross Roggio, by his attorney Melinda C. Ghilardi, Assistant Federal Public Defender, and files the following Motion for Enlargement of Time to File Pretrial Motions. In support thereof, it is averred as follows:

1. On March 20, 2018, Ross Roggio was charged in an Indictment with conspiracy to commit an offense against the United States, in violation of 18 U.S.C. § 371; violations of the Arms Export Control Act, 22 U.S.C. § 2778(b) and (c); and the International Emergency Powers Act, 50 U.S.C. §§ 1702 and 1705(c); smuggling goods from the United States, in violation of 18 U.S.C. §§ 554 and 2; wire fraud, in violation of 18 U.S.C. § 1343; and money laundering, in violation of 18 U.S.C. §§ 1956(a)(2)(A) and 2.

2. On March 23, 2018, Mr. Roggio appeared before Magistrate Judge Karoline Mehalchick for an initial appearance and arraignment. The Federal Public Defender was appointed to represent Mr. Roggio.

3. The Court set the deadline to file pretrial motions as August 27, 2018.

4. Undersigned counsel has received two disclosures of voluminous discovery from the Government. The first disclosure includes 10,000 e-mails, in addition to other items. The most recent disclosure was received on August 15, 2018, and consists of five CDs. Counsel and her staff need additional time to process and review this extremely large amount of discovery.

5. Mr. Roggio respectfully requests an enlargement of time of two months, until October 29, 2018, to file pretrial motions.

6. The delay occasioned by this motion is excludable from the speedy trial calculation pursuant to 18 U.S.C. § 3161(h)(7)(A).

WHEREFORE, the Defendant, Ross Roggio, respectfully requests that this Honorable Court enlarge the time for filing pretrial motions for two months until October 29, 2018.

Respectfully submitted,

Date: August 27, 2018

s/Melinda C. Ghilardi

Melinda C. Ghilardi

Assistant Federal Public Defender

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Attorney for Ross Roggio

CERTIFICATE OF SERVICE

I, Melinda C. Ghilardi, Assistant Federal Public Defender, do hereby certify that this document, the foregoing **Motion for Enlargement of Time to File Pretrial Motions**, filed electronically through the ECF system, will be sent to the registered participants as identified on the Notice of Electronic Filing (NEF), including the following:

Todd K. Hinkley, Esquire
Assistant United States Attorney

and by placing the same in the United States mail, first class, postage prepaid, at Scranton Pennsylvania, addressed to the following:

Mr. Ross Roggio

Date: August 27, 2018

s/Melinda C. Ghilardi

Melinda C. Ghilardi

Assistant Federal Public Defender